

# EXHIBIT 4

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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SUNIL SUDUNAGUNTA,  
Individually and on behalf of all others  
similarly situated,

Plaintiff,

v.

NANTKWEST, INC., PATRICK  
SOON-SHIONG, RICHARD  
GOMBERG, BARRY J. SIMON,  
STEVE GORLIN, MICHAEL D.  
BLASZYK, HENRY JI, RICHARD  
KUSSEROW, JOHN T. POTTS, JR.,  
ROBERT ROSEN, JOHN C.  
THOMAS JR., MERRILL LYNCH,  
PIERCE, FENNER & SMITH, INC.,  
CITIGROUP GLOBAL MARKETS  
INC., JEFFERIES LLC, PIPER  
JAFFRAY & CO., and MLV & CO.,  
LLC.,

Defendants.

Case No. 16-cv-01947-MWF-JEM

Consolidated with  
2:16-cv-3438-MWF-JEM

**CLASS ACTION**

**DECLARATION OF KARA M.  
WOLKE IN SUPPORT OF  
APPLICATION FOR AN AWARD  
OF ATTORNEYS' FEES FILED  
ON BEHALF OF GLANCY  
PRONGAY & MURRAY LLP**

Date: April 29, 2019  
Time: 10:00 a.m.  
Before: Hon. Michael Fitzgerald  
Courtroom: 5A

1 I, KARA M. WOLKE, declare as follows:

2 1. I am a partner at Glancy Prongay & Murray LLP (“GPM”), Court-  
3 appointed Liaison Counsel (*see* ECF No. 34) in the above-captioned action (the  
4 “Action”). I submit this declaration in support of Plaintiffs’ application for an  
5 award of attorneys’ fees. I have personal knowledge of the facts set forth herein  
6 and, if called upon, could and would testify thereto.  
7

8 2. GPM, as Liaison Counsel, was involved in all aspects of the Action  
9 and its settlement including, among other things: conducting factual investigation  
10 in preparation of filing the Complaint and each of the four Amended Complaints;  
11 initiating filings with the Court; drafting and reviewing pleadings, including each  
12 round of Defendants’ motions to dismiss and Plaintiffs’ motion for class  
13 certification; attending hearings; engaging in multiple meet-and-confer processes  
14 with opposing counsel and third party subpoena recipients during discovery;  
15 reviewing voluminous documents produced by Defendants and third parties;  
16 conferring with experts on the topics of liability and damages, and participating in  
17 Settlement negotiations.  
18  
19  
20

21 3. As detailed in the within “Lodestar Chart,” GPM’s total lodestar is  
22 \$871,995.50:  
23

24 **Lodestar Chart**

<b>TIMEKEEPER/CASE</b>	<b>STATUS</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
<b>ATTORNEYS:</b>				
Robert Prongay	Partner	10.50	\$750.00	\$7,875.00
Kara Wolke	Partner	274.80	\$775.00	\$212,970.00
Lesley Portnoy	Partner	26.00	\$650.00	\$16,900.00

Casey Sadler	Partner	5.00	\$650.00	\$3,250.00
Charles Linehan	Associate	19.10	\$425.00	\$8,117.50
Alexa Mullarky	Associate	239.80	\$395.00	\$94,721.00
Melissa Wright	Associate	42.20	\$525.00	\$22,155.00
Vahe Mesropyan	Associate	39.80	\$425.00	\$16,915.00
Mark Berns	Staff Attorney	22.80	\$395.00	\$9,006.00
Pedro R. Ariston	Staff Attorney	1,138.40	\$395.00	\$449,668.00
<b>TOTAL ATTORNEY</b>	<b>TOTAL</b>	<b>1,773.40</b>		<b>\$841,577.50</b>
<b>PARALEGALS:</b>				
	Senior Paralegal			
Harry Kharadjian	Paralegal	47.75	\$290.00	\$13,847.50
Samantha Skouras	Paralegal	14.00	\$200.00	\$2,800.00
Emily Oswald	Paralegal	11.00	\$225.00	\$2,475.00
	Research Analyst			
Jack Ligman	Analyst	21.75	\$310.00	\$6,742.50
	Research Analyst			
Michaela Ligman	Analyst	15.70	\$290.00	\$4,553.00
<b>TOTAL PARALEGAL</b>	<b>TOTAL</b>	<b>113.40</b>		<b>\$30,418.00</b>
<b>TOTAL LODESTAR</b>	<b>TOTAL</b>	<b>1,886.80</b>		<b>\$871,995.50</b>

4. The Lodestar Chart sets forth the amount of time GPM attorneys and professional staff billed from inception of the Action through and including April 1, 2019. The lodestar calculation for those individuals is based on GPM's current billing rates.

5. The schedule was prepared from contemporaneous daily time records regularly prepared and maintained by GPM. Time expended on GPM's application for fees and reimbursement of expenses has *not* been included in this request. In addition, attorneys and professional staff with fewer than five (5) hours of time dedicated to the matter are not included in the lodestar report.

7. GPM's lodestar figures are based on its billing rates, which do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in GPM's billing rates.

Kara M. Wolke